

Fill in this information to identify the case:

Debtor 1 Jeffrey A Baylin

Debtor 2 Andrea L Baylin
(Spouse, if filing)

United States Bankruptcy Court for the: _____ District of Maryland
(State)

Case number 15-24741

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: U.S. BANK TRUST NATIONAL ASSOCIATION ,
AS TRUSTEE OF THE IGLOO SERIES III TRUST Court claim no. (if known): 5-1

Last 4 digits of any number you use to identify the debtor's account: 2 6 8 3

Property address: 12815 Saddle Brook Dr
Number Street

Silver Spring MD 20906
City State ZIP Code

Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____

Part 3: Postpetition Mortgage Payment

Check one:

- ☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: ____/____/____
MM / DD / YYYY

- ☒ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: 6/01/2020-03/01/2021 10@ \$2,172.37 (a) \$ 21,723.70
- b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ _____
- c. **Total.** Add lines a and b. (c) \$ 21,723.70

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on: **** 06 / 01 / 2020
MM / DD / YYYY

****Relief from Stay was granted on 07/13/2020 via an amended Notice of Default and Notice of Termination of Automatic Stay.

Debtor 1 Jeffrey A Baylin
First Name Middle Name Last Name

Case number (if known) 15-24741

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

X /s/Keith Yacko
Signature

Date 03 / 15 / 2021

Print Keith Yacko
First Name Middle Name Last Name

Title Attorney for Creditor

Company McMichael Taylor Gray, LLC

If different from the notice address listed on the proof of claim to which this response applies:

Address 3550 Engineering Drive, Suite 260
Number Street

Peachtree Corners, GA 30092
City State ZIP Code

Contact phone (470) 289- 4347

Email kyacko@mtglaw.com

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
Greenbelt Division**

In Re: Jeffrey Alan Baylin and Andrea Lynn
Baylin

Case No. 15-24741-LSS
Chapter 13

U.S. BANK TRUST NATIONAL
ASSOCIATION, AS TRUSTEE OF THE
IGLOO SERIES III TRUST, Movant (BSI
Financial Services, INC., Servicer)
vs.

Jeffrey Alan Baylin
and Andrea Lynn Baylin, Debtors
Rebecca A. Herr, Trustee
Respondent(s)

**AMENDED NOTICE OF DEFAULT AND NOTICE OF TERMINATION OF
AUTOMATIC STAY**

The Debtor has failed to comply with the Consent Order and Stipulation Modifying Automatic Stay entered August 18, 2017, in the following manner:

The Debtors should have paid a regular monthly payment in the amount of \$2,183.46 for the month of September 2017, \$2,176.93 per month for the months of October 2017 through May 2019, \$2,156.33 per month for the months of June 2019 through May 2020, and \$2,172.37 per month for the months of June 2020 through July 2020. “Additional” monthly payments should have been made in the amount of \$826.92 per month for the months of September 2017 through February 2018. The debtor has paid \$66,685.69. The amount necessary to cure the default is therefore \$14,318.58 which includes attorney’s fees and costs in the amount of \$100.00. **All subsequent payments and late charges that come due after the filing of this**

notice must be included in the payment to cure the default.

Under the provisions of the Consent Order, the stay of Section 362 (a) will terminate and the Movant will resume the foreclosure of its Deed of Trust recorded among the land records of Montgomery County, Maryland, and which is secured by the property of the Debtors at **12815 Saddlebrook Drive, Silver Spring, Maryland 20906**, unless the default noted is cured within ten (10) days from the date this notice is filed. The Consent Order applies to proceedings for possession of the property after foreclosure.

Signed and mailed this 13th day of July, 2020.

Respectfully submitted:

/s/ Kevin Feig, Esq. (kf)

Kevin Feig, Esq.

Attorney for Movant

Bar No. 15202

McCabe, Weisberg & Conway, LLC

312 Marshall Avenue, Suite 800

Laurel, MD 20707

301-490-1196

bankruptcymd@mwc-law.com

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of July, 2020 I reviewed the Court's CM/ECF system and it reports that an electronic copy of the foregoing pleading will be served electronically by the Court's CM/ECF system on the following:

Rebecca A. Herr
Chapter 13 Trustee
185 Admiral Cochrane Dr.
Suite 240
Annapolis, Maryland 21401
ecf@ch13md.com

Robert A. Siegel, Esq
Law Office of Marla Zide, LLC
7310 Ritchie Highway
Suite 1001
Glen Burnie, Maryland 21061
Robert@marlazidelaw.com

I hereby further certify that on the 13th day of July, 2020, a copy of the foregoing pleading was also mailed first class mail, postage prepaid to:

Jeffrey Alan Baylin
12815 Saddlebrook Drive
Silver Spring, Maryland 20906
(Via U.S Mail)

and

Andrea Lynn Baylin
12815 Saddlebrook Drive
Silver Spring, Maryland 20906
(Via U.S Mail)

/s/ Kevin Feig, Esq.
Kevin Feig, Esq.

CERTIFICATE OF SERVICE

The undersigned hereby certifies under penalty of perjury that he/she is over eighteen (18) years of age and that the **RESPONSE TO NOTICE OF FINAL CURE PAYMENT** in the above captioned case was this day served upon the below named persons by mailing, postage prepaid, first class mail or by electronic service copy of such instrument to each person, party, and/or counsel at the addresses shown below:

Via U.S. Mail

Andrea L Baylin
12815 Saddlebrook Drive
Silver Spring, MD 20906

Jeffrey A Baylin
12815 Saddlebrook Drive
Silver Spring , MD 20906

Via CM/ECF electronic service:

Rebecca A. Herr
185 Admiral Cochrane Dr.
Suite 240
Annapolis, MD 21401

Law Office of Marla Zide LLC
7310 Ritchie Highway
Suite 1001
Glen Burnie, MD 21061

Dated: March 15, 2021

Respectfully submitted,
/s/ Keith Yacko
Keith Yacko Fed I.D. 21598
MCMICHAEL TAYLOR GRAY, LLC
3550 Engineering Drive, Suite 260
Peachtree Corners, GA 30092
Telephone: (404) 474-7149
Facsimile: (404) 745-8121
E-mail: kyacko@mtglaw.com